

1 MARK R. THIERMAN (SBN 72913)
LEON GREENBERG (SBN 226253)

E-filed 7/21/06

2 **THIERMAN LAW FIRM**

7287 Lakeside Drive

3 Reno, NV 89511

Telephone: 775-284-1500

4 Facsimile: 775-703-5027

laborlawyer@pacbell.com

5 Attorneys for Plaintiff

6 CATHERINE A. CONWAY (SBN 98366)

7 GREGORY W. KNOPP (SBN 237615)

S. ADAM SPIEWAK (SBN 230872)

8 **AKIN GUMP STRAUSS HAUER & FELD LLP**

2029 Century Park East, Suite 2400

9 Los Angeles, California 90067-3012

Telephone: 310-229-1000

10 Facsimile: 310-229-1001

cconway@akingump.com

11 gknopp@akingump.com

aspiewak@akingump.com

12 Attorneys for Defendant ERNST & YOUNG LLP

13
14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 (SAN JOSE DIVISION)
17

18 DAVID HO, on behalf of himself and others
19 similarly situated and on behalf of the
20 general public and DOES 1-20

21 Plaintiff,

22 v.

23 ERNST & YOUNG, LLP

24 Defendant.
25
26
27
28

Case No. C 05-04867-JF (HRL)

**PARTIES' JOINT STIPULATION
REQUESTING SHORTENING TIME**


~~PROPOSED~~ ORDER AS AMENDED BY THE COURT

Defendant will file (electronically) its Motion for Protective Order and supporting memorandum on or before July 28, 2006. Plaintiff will file its Opposition brief on or before August 4, 2006. Defendant will file its Reply brief on or before August 9, 2006.

After reading the papers, the court will either set a hearing date or take the matter under submission without oral argument.

SO ORDERED.

Dated: 7/21/06



Hon. Howard R. Lloyd, United States Magistrate Judge

1 The parties to the above-entitled action jointly submit this Stipulation and
 2 Proposed Order and request the Court to adopt it, as appropriately determined by the
 3 Court. The parties respectfully request that the Court shorten time for the adjudication
 4 of Defendant's forthcoming Motion for Protective Order, consistent with the schedule
 5 proposed below.

6 WHEREAS the parties have met and conferred in good faith in order to agree
 7 upon a Stipulated Protective Order, but have reached an impasse concerning the terms
 8 governing access to and use of protected material; and

9 WHEREAS the absence of a protective order is impeding the discovery process,
 10 including the deposition of Plaintiff; and

11 WHEREAS, consistent with the Court's Early Neutral Evaluation requirement,
 12 the parties have agreed to engage in mediation, upon the completion of Plaintiff's
 13 deposition;

14 THEREFORE the parties stipulate and agree that Defendant will file
 15 (electronically) its Motion for Protective Order and supporting memorandum on or
 16 before July 28, 2006; that Plaintiff will file its Opposition brief on or before August 4;
 17 that Defendant will file its Reply brief on or before August 9; and that, with the Court's
 18 permission, oral argument on the matter is waived.

19 Respectfully submitted,

20 Dated: July 14, 2006

THIERMAN LAW FIRM

21  Validity unknown

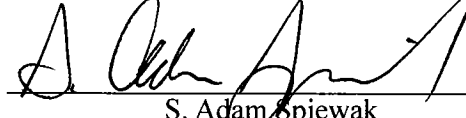
Leon Greenberg

Digitally signed by Leon
Greenberg
DN: cn=Leon Greenberg, c=US
Date: 2006.07.14 16:48:13
+0700

22 Leon Greenberg
 23 Attorneys for Plaintiff
 24 DAVID HO

25 Dated: July 14, 2006

AKIN GUMP STRAUSS HAUER & FELD LLP

26 

27 S. Adam Spiewak
 28 Attorneys for Defendant
 ERNST & YOUNG, LLP